

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Benjamin Case, *et al.*,
Plaintiffs,
v.
The City of New York, *et al.*,
Defendants.

Case No. 14-cv-09148 (JLR)(BCM)

**DECLARATION OF
J. REMY GREEN**

STATE OF NEW YORK)
) ss.:
COUNTY OF KINGS)

I, Remy Green, being duly sworn, depose and say:

1. I am a partner at Cohen&Green P.L.L.C., co-counsel for Plaintiffs in this case.
2. I make this declaration to place certain documents in my control in the record on the various motions *in limine*.
3. Attached as Exhibit 1 is a true copy of an excerpt from Defendants' July 17, 2017 responses and objections to Plaintiff's first set of interrogatories and document demands.
4. Attached as Exhibit 2 is a true copy of the City of New York's Interrogatory Responses in *Gyasi v. City of N.Y.*, No. 05 Civ. 9453 (SAS) (S.D.N.Y.).
5. Attached as Exhibit 3 is a true copy of a transcript of the Court's June 29, 2006 ruling on motions *in limine* in *Gyasi*.
6. Attached as Exhibit 4 is an exemplar of Plaintiff's proposed mode of approaching how to present the *Monell* issue of past protest litigation under Fed. R. Ev. 1006, using *Haus* (03-cv-4915 (S.D.N.Y.) (RWS)(MHD) as the starting point (the idea being Plaintiff will fill out the rest of the chart similarly, but if there is other

information Defendants want in the chart — or that the Court believes is necessary — Plaintiff would like to understand that before undertaking the mammoth task of reviewing and summarizing thousands of pages of litigation records). As noted in the accompanying memo, the left-hand column is a partial list of cases we propose to summarize.

I declare, under penalty of perjury, that the statements above are true and correct.

Executed On: April 27, 2023

/s/

J. Remy Green